

State Water Resources Control Board

August 4, 2014

Ms. Kathy Hubbard
Alta Environmental
3777 Long Beach Boulevard
Annex Building
Long Beach, CA 90807

COMMENTS ON THE DRAFT POLLUTION PREVENTION PLAN FOR SOUTHEAST SANTA CATALINA ISLAND (NO. 28) AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE

Dear Ms. Hubbard:

The State Water Resources Control Board (State Water Board) received the Areas of Special Biological Significance (ASBS) draft Pollution Prevention Plan from Alta Environmental prepared for Connolly-Pacific Company dated September 20, 2013. A draft Pollution Prevention Plan is required under section I.B.2.a of Attachment B of the State Water Board's Resolution No. 2012-0012 *Approving Exceptions to the California Ocean Plan for Selected Discharges into Areas of Special Biological Significance, Including Special Protections for Beneficial Uses, and Certifying a Program Environmental Impact Report (General Exception)*. Attachment B of the General Exception contains the *Special Protections for Areas of Special Biological Significance, Governing Point Source Discharges of Storm Water and Nonpoint Source Waste Discharges (Special Protections)*, which describes special conditions required of the discharger.

State Water Board staff has reviewed the draft Pollution Prevention Plan and provides the following comments:

1. **Map of storm water runoff:** Section I.A.2.a. of the Special Protections requires a map displaying surface drainage of storm water runoff that highlights the prioritized discharges and describes the structural Best Management Practices (BMPs) employed or to be employed. This section also requires a procedure for updating the map when changes are made.

Figure 2 in the draft Pollution Prevention Plan shows the site layout which includes BMPs, flow, and outfall locations. However, it does not highlight prioritized discharges. Please address this requirement and also include a procedure describing how and when these maps will be updated in the final Pollution Prevention Plan.

2. **BMPs to address storm water discharges:** Section I.A.2.d. in the Special Protections requires that all storm water discharges be addressed and, in particular, a description of how pollutant reductions in storm water runoff, that are necessary to comply with the special conditions, will be achieved through BMPs.

The draft Pollution Prevention Plan does describe structural storm water BMPs to control runoff which includes sediment basins and benches. The Plan also describes water chemistry results from Bight '08 described in section II.i. which indicate there might be discharge locations into ASBS No. 28 where copper and nickel exceeded Ocean Plan Objectives. We realize current monitoring data collected from the core discharge and receiving water sites are not yet available. If these data do not show a reduction in pollutants with current structural controls, please describe how new BMPs will achieve compliance.

- 3. Address erosion control:** Section I.A.2.e states the discharger shall address erosion control and prevention of anthropogenic sedimentation in the ASBS. The natural habitat conditions in the ASBS shall not be altered as a result of anthropogenic sedimentation.

In section III of the draft Pollution Prevention Plan, erosion control was mentioned as part of the reclamation plan that will take place if the quarry is depleted or if the lease ends. Please specifically describe erosion controls that are currently employed or will be employed to prevent anthropogenic sedimentation.

- 4. Compliance and Implementation schedule:** Section I.A.3.b. requires the final Compliance Plan to include a schedule for structural controls based on results of the runoff and the receiving water monitoring to be submitted within 30 months from the effective date of the General Exception. Section I.A.3.d. stipulates that any structural controls identified in the final Compliance Plan be operational within six years of the effective date.

We understand that results from receiving water and core discharge monitoring may change which structural controls are necessary to comply with the Special Protections. Please include a description and schedule for any additional projects to be implemented and operational by the compliance deadline of March 20, 2018. If this compliance deadline cannot be met, additional information is required to support an extension.

- 5. Non-structural BMPs:** Section I.A.2.f. requires the ASBS Pollution Prevention Plan to describe non-structural BMPs currently employed and planned in the future (including those for construction activities), and include an implementation schedule. The plan shall also include non-structural BMPs that address public education and outreach.

The draft Pollution Prevention Plan does not contain any descriptions of non-structural BMPs that have been or will be implemented. It also does not contain any public outreach activities or an implementation schedule. Please include these requirements in the final Pollution Prevention Plan.

We appreciate the efforts of the Connolly-Pacific Company on the draft Pollution Prevention Plan and will continue to collaborate to resolve the comments mentioned in this letter as needed. By September 20, 2014, please submit the final Pollution Prevention Plan for approval by the State Water Board Executive Director and that addresses the above comments.

For further questions pertaining to this subject matter, please contact Dr. Maria de la Paz Carpio-Obeso, Ocean Unit Chief, at (916) 341-5858 or MarielaPaz.Carpio-Obeso@waterboards.ca.gov.

Sincerely,


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